

Document No: ROPP-0062	TITLE: Prescription Drug Monitoring Program		
Parent Document(s): N/A			
Effective Date: See Document Information Page	Last Review Date: See Review and Revision History Section	Business Process Owner Title (Name Optional): Director, Pharmacy Operations	
Exhibit(s): N/A			
Document Type:	<input checked="" type="checkbox"/> Policy and Procedure	<input type="checkbox"/> Standard	<input type="checkbox"/> Work Instructions /Training Manual

OVERVIEW

Most States operate a Prescription Monitoring Program (PMP). The PMP is an invaluable tool for Pharmacists to prevent controlled substances from being diverted or dispensed for non-medical purposes, while at the same time ensuring that patients with legitimate medical need continue to have access. In particular, PMPs cut down on prescription fraud and “doctor shopping” by providing Prescribers and Pharmacists with more complete information about a patient’s controlled substance prescription history.

LEGAL REQUIREMENTS AFFECTING PHARMACISTS

Due to the different requirements within each PMP program, it is important for Pharmacists to understand the requirements of their States in which they are licensed and practicing.

Many States establish specific requirements regarding access and use of information in the database and confidentiality. For example, some States require a Pharmacist to access the database prior to dispensing. For a list of current States with this requirement, click [HERE](#). Failure to abide by these specific requirements can subject the Pharmacist and the company to various penalties.

SCOPE

This policy and procedure applies to all CVS/pharmacy Retail Stores operating in States where a PMP website is available for use.

POLICY

GUIDELINES WHEN MAKING DECISIONS REGARDING PMP DATABASE INFORMATION:

In addition to understanding the requirements and exceptions to the PMP laws in your State, a Pharmacist should think about some general considerations with regard to accessing and using the PMP database.

Registration for Access

- **CVS/pharmacy requires all Pharmacists to register for their States PMP and complete a LEARNet Acknowledgement, course # 209802, attesting that they have completed registration**

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EXHIBIT
P-15843_00001

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- Registration information for your State PMP is available on RxNet on the State Specific PMP page. Each State Specific Page will have a detailed Workload Manager Task outlining the process required to complete the registration process
- Most States require individual Pharmacist accounts and will only provide access based on individual e-mail accounts. Pharmacists are permitted to utilize their personal email address to register for access to their State's specific Prescription Monitoring Program Website
- In some States you will need to use the Store email account to receive emails from the PMP. In these cases, you should use the following email address:
RxXXXXX@stores.cvs.com (XXXXXX = 5 digit store number)
- If your Store has external email access you are only authorized to use it for business purposes. Use of external email for personal reasons is strictly forbidden

Deciding to Access the PMP Database

- Follow State requirements for mandatory access and/or review
- In addition to following State laws, Pharmacists must also access and review PMP data whenever they identify red flags that are not able to be resolved or are reasonably certain that a person may be attempting to obtain a Schedule II-V controlled substance for fraudulent, illegal, or a medically inappropriate purpose. This review will provide a more complete controlled substance history to use their professional judgment and base their decision on whether to fill or refuse to fill that prescription
- Some other factors you might consider in deciding whether to access PMP data are:
 - The type of drug being dispensed;
 - Lack of patient history in RxConnect;
 - Whether, in your professional opinion, access to the database would aid in exercising your corresponding responsibility

Access to the PMP Database

All available websites can be found on RxNet under the State Specific PMP link; from here, select appropriate State. A link to the Prescription Drug Monitoring Website for your State will be located on the State page. **You may only access these websites to check and monitor use of controlled substances in direct relation to patient care.**

- You may only access these PMP websites through Rx Net or thru the menu option on the verification screens of RxConnect. You are not authorized to access these websites via any personal devices, home computers, smart phones, blackberries, etc
- When logging into a State prescription drug monitoring website, you are to use only your personal logon information or the Store's logon information, whichever is required/allowed by your State
- Access is limited to Pharmacists and Grad Interns only. Technicians, Interns and other non-Pharmacists are strictly prohibited from accessing these websites regardless of individual State laws/regulations which may allow non-Pharmacists access
- If your State is a participant in the InterConnect program, a Pharmacist may also be able to access additional State data if needed. Currently, 28 States are fully operational and

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participate in the InterConnect program, including: Arizona, Arkansas, Colorado, Connecticut, Delaware, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Nevada, New Jersey, New Mexico, North Dakota, Ohio, Oklahoma, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Virginia, West Virginia, and Wisconsin. Not all of the participating States share information with each of the participating States; participation in the sharing of data will vary

Review of Patient and Prescriber Data

- If a Pharmacist checks the PMP database prior to filling a prescription, the Pharmacist should consider the following in determining how to use the information:
 - Closely review patients receiving prescriptions for the same drug or multiple controlled substances from different Practitioners
 - If geographic data is available, note cases where patients appear to be visiting Practitioners outside of the area/State where they live
 - Limitations on data provided may necessitate Pharmacists asking questions of patients and/or Providers to get the full picture (e.g. patients listed without specific identifiers, Prescribers not listed on file, etc)

What to do with PMP Data

- You have a corresponding responsibility to ensure each controlled substance prescription is being used for legitimate medical need prior to dispensing. This includes *both* identifying red flags and working to resolve them if possible
 - The information contained within the PMP website should be used, as appropriate, to assist you in exercising your professional judgment when evaluating a controlled drug prescription
 - Contact the Prescriber to address any questions or concerns regarding the type and quantity of medication, the diagnosis and treatment, number of refills, the patient's prescription history or any other information relevant to decide whether the prescription should be filled or declined
 - Document the information on the back of the prescription and, as appropriate, in the patient's profile
 - It is not necessary to print any information from the PMP. If material is printed from the website, it should be discarded in your confidential blue bags
- Note that this verification process is but one step that Pharmacists should take to assess whether the prescription was issued for a legitimate medical purpose. Practitioner verification alone does not render a prescription legitimate. There is no uniform, defined standard to quantify whether an individual has received too many prescriptions or dosage units of a particular medication, or whether the individual is "Doctor shopping." ("Doctor shopping" is a practice whereby a patient seeks prescriptions for the same drug(s) from multiple Physicians.) You must evaluate each situation individually as you exercise your Corresponding Responsibility.

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- CVS Caremark expects and supports decisions by its Pharmacists to not fill prescriptions if, in the sound exercise of their professional and clinical judgment, they believe or suspect that a prescription was not issued for a legitimate medical purpose by a Practitioner acting in the usual course of professional practice.
Click the following link to view important policies relating to dispensing:
Guidelines for Dispensing Controlled Substances -from the Pharmacy Operations Manual available on RxNet. If you are unable to validate and verify the prescription to your satisfaction, the Pharmacist must inform the patient of the decision not to fill the prescription
- If the prescription has been forged or altered, [or if you believe or suspect that the patient is "Doctor shopping,"] you should retain a copy of the prescription and follow the other steps outlined in the policy titled *Suspected Fraudulent or Altered Prescriptions*

To review specific PMP information for States currently with access through RxNet, please click [HERE](#). If you have any questions, contact your PIC or Supervisor.

DEFINITIONS (All defined words in this document should be displayed with initial capitals, except for acronyms.)

N/A

REVIEW AND REVISION HISTORY

Date	Revision No.	Reason for Change	Sections Affected
04/24/2012	1.0	New Policy and Procedure	All
05/10/2013	2.0	Update Policy and Procedure; Transfer to Current P&P Template	All
07/17/2014	3.0	No Changes in Process or Document	N/A
07/15/2015	4.0	Annual Review; Transfer to Current P&P Template	No Changes in Process or Document
09/23/2015	5.0		